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**COMMENTS OF THE CITY OF STOCKTON  
CONCERNING THE CALFED DRAFT  
PROGRAMMATIC EIS/EIR AND  
REVISED PHASE II REPORT**

AUG 18 1999

Public Hearing  
Stockton, California

August 18, 1999

The City of Stockton is pleased to have the opportunity to offer these comments on the CALFED Draft Programmatic EIS/EIR and its appendices, including the Revised Phase II Report. These comments summarize the City's views on the main issues of concern to it; the City may submit additional detailed comments in writing by the close of the comment period on September 23, 1999.

The City of Stockton is located on the San Joaquin and Calaveras Rivers, and is partially within the legally defined Delta. It is vitally interested in water quality in the San Joaquin River and the Delta, and concerned with water supply in Eastern San Joaquin County.

The City is generally in agreement with the Statement of San Joaquin County Supervisor Robert J. Cabral. In particular, the City agrees with San Joaquin County's statement that CALFED must respect the Area of Origin and Delta Protection provisions of California Law in carrying out its programs. The City has not yet taken a position on an isolated facility, but this is not one of the CALFED Preferred Alternatives at this time. The City's comments on specific topics follow.

#### SOUTH DELTA BARRIERS

The City of Stockton supports the installation of an operable Head of Old River Barrier to provide a method to directly (i.e. adaptively) manage the allocation of San Joaquin River flow past Stockton and flow into Old River. The Head of Old River Barrier should be operated for multiple purposes, including: (1) maintaining flows in the Main Stem San Joaquin River to improve fish migration, (2) maintaining water depths in South Delta Channels, (3) maintaining positive flow in the San Joaquin River past Stockton to assist in meeting dissolved oxygen (DO) requirements, and (4) maintaining flow in the San Joaquin River to carry salts out to the San Francisco Bay, not through South Delta channels to the export pumps.

The City also supports all three of the agricultural barriers proposed by the South Delta Water Agency, including the Grant Line Canal Barrier.

Decisions regarding operation of the Head of Old River Barrier and the agricultural barriers must be made by a committee which includes representatives of local interests. The City of Stockton asks to be a member of the Barrier Operations Committee. Operation of the Head of Old River Barrier should be controlled on a real time basis in conjunction with water stage, water quality, and fish monitoring information.

#### WATER QUALITY (SALINITY) AT VERNALIS AND UPSTREAM

The City of Stockton supports a bundle of actions to deal with water quality at Vernalis, and in the San Joaquin River upstream from Vernalis. In order to adequately protect the Delta environment, CALFED must devise and implement a comprehensive plan for improvement of water quality in the San Joaquin River.

The CALFED Water Quality Program must assure that the salinity objective at Vernalis, designed to protect agricultural uses, is met.

In addition, water quality objectives should be established on the main stem San Joaquin River in the 130-mile segment that is listed on the Clean Water Act Section 303(d) list as impaired. We were pleased to see that the CALFED Water Quality Program Plan states that CALFED should support establishment of water quality objectives, development and implementation of Best Management Practices (BMPs), development of Total Maximum Daily Loads (TMDLs) (as necessary), and financial incentives for salt control. (Water Quality Program Plan, p. 7-15.) CALFED should also support the monitoring and studies needed by the Regional Water Quality Control Board to establish water quality objectives. (Water Quality Program Plan, p. 7-20.) In general, CALFED should support and fund the Regional Board as necessary in its

adoption of a Basin Plan Amendment for salinity and boron in the entire 130-mile water quality impaired segment of the San Joaquin River.

#### DISSOLVED OXYGEN

CALFED should continue to support the development of a TMDL for dissolved oxygen in the San Joaquin River. The City of Stockton is taking a prominent role in the development of such a TMDL. The TMDL process involves cities, wastewater dischargers, federal and state regulatory and resource agencies, interested parties and stakeholders on the San Joaquin River. The goals of the TMDL study include determining the sources of oxygen demanding discharges to the river, defining the causes of low dissolved oxygen, and apportioning responsibility for correcting the problems which have been identified. The TMDL is expected to take three years to complete. The City of Stockton acknowledges and appreciates the assistance of CALFED in approving a grant to the TMDL Steering Committee for the purpose of researching the causes of the low dissolved oxygen episodes and devising solutions for the various issues involved. The City also applauds the active participation of CALFED staff in the TMDL steering committee and other committees

The Head of Old River Barrier can assist in meeting the DO standards by helping to keep a positive downstream flow in the San Joaquin River past Stockton and adaptively managing flows to maximize benefits for all beneficial uses. As noted above, the City would like to be a member of the committee that makes decisions regarding Head of Old River Barrier operations.

Because the DO objective was established for the protection of fish, particularly fall-run chinook salmon, and because adequate flow in the San Joaquin River is an element of meeting DO requirements, CALFED should assure funding for purchases of water necessary to meet the DO objectives, similar to the purchases of water for meeting

the spring pulse flow at Vernalis. Such purchases could be made using CVPIA restoration funds or CALFED funds, and should be part of the CALFED Program.

With reference to paragraph 2.4.1 of the *Water Quality Program Plan* document, the City of Stockton would like to remind CALFED staff that Stockton has been working for more than 25 years to reduce Regional Wastewater Control Facility (RWCF) contributions to low DO episodes, including the construction of the only tertiary wastewater treatment plant in the San Joaquin valley, and is taking a prominent role in the development of a dissolved oxygen TMDL for the San Joaquin River, which includes committing over half a million dollars to assist in TMDL development. Stockton has also invested considerable money to reduce the BOD and algae loads from the RWCF. The high cost of further treatment is, in our opinion, disproportional to the potential benefits. DO is a watershed issue. Flow management, control of upstream BOD and nutrient loads, or instream aeration techniques (i.e., Corps of Engineers jet aeration or side-stream waterfalls) may prove more effective than ammonia removal.

#### GROUNDWATER STORAGE IN EASTERN SAN JOAQUIN COUNTY

The City of Stockton strongly supports the construction of groundwater banking facilities in the Eastern San Joaquin and Delta-Central Sierra groundwater basins represented by the projects listed on Page 89 of the Phase II Report. CALFED must recognize and deal with the water supply problems and groundwater overdraft in Eastern San Joaquin County.

#### ADDITIONAL COMMENTS (REFERENCES TO REVISED PHASE II REPORT)

Section 3.6.2 Water Use Efficiency. CALFED should refer the question of the use of recycled reclaimed wastewater to the Agricultural Water Management Council for study and the development of a policy statement. There is considerable resistance from the Agricultural Community to the use of recycled reclaimed wastewater even though the requirements of Title 22 are met. The Agricultural Water Management Council

should develop assurances satisfactory to the Agricultural community that will allow the recycling objectives to be realized.

The City strongly supports the water conservation actions and goals set forth in the Revised Phase II Report.

CALFED's list of potential surface storage sites does not include any site in San Joaquin County. The City of Stockton would point out to CALFED that a number of very attractive sites exist in San Joaquin County which could be used in a conjunctive manner with groundwater storage for north of the Delta storage. These sites include Middle Bar and Duck Creek (offstream) on the Mokelumne, South Gulch (offstream) on the Calaveras, and Littlejohns Creek (offstream) on the Stanislaus. It is requested that the Phase II Report list these as potential storage sites under the CALFED program.

Thank you for the opportunity to comment.